

2021R01105/OB

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Julien Xavier Neals
	:	
v.	:	Crim. No. 22- 614
	:	
MICHAEL STEWART	:	18 U.S.C. § 1958
	:	18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges that:

COUNT ONE

From at least in or around Summer 2021 through in or around October 2021, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL STEWART,

did knowingly and intentionally conspire to and use, and cause another to use, a facility of interstate commerce, that is, a telephone, with intent that a murder be committed, in violation of the laws of the State of New Jersey, specifically, N.J.S.A. § 2C:11-3, as consideration for a promise and agreement to pay something of pecuniary value, that is, United States currency.

In violation of Title 18, United States Code, Section 1958 and Section 2.

FORFEITURE ALLEGATION

As a result of committing the offense charged in this Information, the defendant,

MICHAEL STEWART,

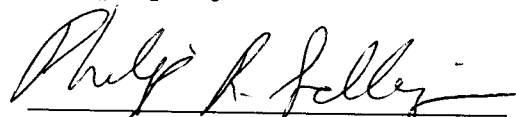
shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461 any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offense, and pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461, any firearm and ammunition involved in or used in the commission of such offense.

Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 18 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


PHILIP R. SELLINGER
United States Attorney